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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

12 ***

13 JIMMY JIHO PARK, an individual;

14 Plaintiff,

15 vs.

16 GEICO ADVANTAGE INSURANCE
COMPANY., a Maryland Corporation; DOES
17 I through XV, and ROE CORPORATIONS I
through X, inclusive,

18 Defendants.
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CASE NO.: 2:20-cv-1343-JCM-EJY

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE A
RESPONSE TO DEFENDANT'S MOTION
TO DISMISS AND MOTION TO
BIFURCATE AND STAY SECOND,
THIRD AND FOURTH CAUSES OF
ACTION (ECF No. 5 & 6)**

20 The parties, by and through their undersigned counsel of record, hereby stipulate and agree
21 that the time for Plaintiff Jimmy Jiho Park ("Mr. Park" or "Plaintiff") to file his response to
22 Defendant's Motion to Bifurcate and Defendant's Motion to Dismiss, said responses being due on
23 August 11, 2020, be extended until **August 25, 2020**.

24 **Reason for Extension**

25 Because of the cases recent removal to Federal Court, and Plaintiffs' Counsel only recently
26 becoming aware of the pending motions, along with the complexity and potential dispositive effects
27 of Defendant's Motions, Plaintiff requires additional time to perform a full analysis and respond
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1 accordingly. A brief extension will provide Mr. Park and his counsel sufficient time to prepare an
2 appropriate response. This stipulation is made in good faith and not for the purpose of delay.

3 This is the first extension of time requested by counsel for filing Plaintiff's response to
4 Defendant's Motion to Bifurcate and Motion to Dismiss.

5 DATED this 10th day of August, 2020.

DATED this 10th day of August, 2020.

6 LEWIS BRISBOIS BISGAARD & SMITH

V3 LAW LLC

7
8 /s/ Cheryl A. Grames

/s/ Jose E. Valenzuela III

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14
15 **ORDER**

16 IT IS SO ORDERED.

17 Dated August 17, 2020.

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20 U.S. DISTRICT COURT JUDGE
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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that on the 10th day of August, 2020, I electronically transmitted the foregoing STIPULATION AND ORDER using the CM/ECF system for filing and transmittal to all interested parties:

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